

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ERIE DIVISION

ABBY B. CONLEY,	) Docket No. 05-76E
	) (SEAN J. MCLAUGHLIN)
Plaintiff,	)
	) ELECTRONICALLY FILED PLEADING
vs.	) JURY TRIAL DEMANDED
	)
COUNTY OF ERIE, ERIE COUNTY	) MOTION TO EXTEND DEADLINE TO FILE
OFFICE OF CHILDREN AND YOUTH,	) DISPOSITIVE MOTIONS
a/k/a ERIE COUNTY CHILD WELFARE	)
SERVICE, RICHARD SCHENKER,	) Counsel of record for this party:
individually and in his capacity as County	)
Executive of Erie County, Pennsylvania,	) Richard A. Lanzillo, Esq.
PETER CALLAN, individually and in his	) Knox McLaughlin Gornall
capacity as Erie County Director of	) & Sennett, P.C.
Personnel, DEBRA LIEBEL, individually	) 120 West 10 <sup>th</sup> Street
and in her capacity as Executive Director,	) Erie, PA 16501
Erie County Office of Children and Youth,	) Telephone (814) 459-2800
a/k/a Erie County Child Welfare Service	) Facsimile (814) 453-4530
and JOHN A. ONORATO, ESQUIRE,	) Email rlanzillo@kmgslaw.com
individually and in his capacity as Erie	) PA53811
County Solicitor,	)
	)
Defendants	)

**MOTION TO EXTEND DEADLINE TO FILE DISPOSITIVE MOTIONS**

AND NOW, come defendants County of Erie, Erie County Office of Children and Youth a/k/a Erie County Child Welfare Service, Richard Schenker in his official capacity as County Executive of Erie County, Pennsylvania, Peter Callan in his capacity as Erie County Director of Personnel, and Debra Liebel in her official capacity as Executive Director, Erie County Office of Children and Youth a/k/a Erie County Child Welfare Service, by and through their counsel, Knox McLaughlin Gornall & Sennett, P.C. and file the following motion requesting a brief extension in the deadline for filing dispositive motions:

1. The current deadline for filing dispositive motions is April 10, 2006.
2. The week prior to April 10, 2006, and as late as Friday, April 7, 2006, the parties were conducting depositions of essential third-party witnesses and parties.
3. The testimony of some of these witnesses is relevant to these defendants' motion for summary judgment, which they intend to file in this matter
4. While the court reporters working on this matter have engaged in expedited transcription and have taken all possible steps to complete the transcription work prior to April 10, 2006, it does not appear that all of the relevant testimony will be transcribed in time to meet the present deadline for dispositive motions.
5. In order to allow the filing of all relevant testimony, and the proper citation to that testimony within any dispositive motions, these defendants respectfully request that the Court extend the deadline for filing dispositive motions until Wednesday, April 12, 2006.

WHEREFORE, these defendants respectfully request that this Court enter an order extending the deadline for filing dispositive motions until April 12, 2006.

Respectfully Submitted,

KNOX McLAUGHLIN GORNALL &  
SENNETT, P.C.

BY: /s/ Richard A. Lanzillo, Esq.  
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